COMMONWEALTH OF MASSACHUSETTS Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE SECOND SET OF INFORMATION REQUESTS FROM THE BAY STATE GAS COMPANY DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-32 Refer to the Cavallo Testimony at 14, line 20-22 and the response to BSG-AG-2-32. Of those companies Mr. Cavallo has performed root cause analysis, identify the top five root causes which typically contribute to increasing leak rates in existing underground natural gas transmission and distribution company systems.

Response: Mr. Cavallo does not understand the question as asked. There appears to be an error in the second referent of the first sentence.

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